

Honorable Richard A. Jones  
Honorable J. Richard Creatura

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

IAN SIMMERS,

Plaintiff,

v.

KING COUNTY, *et al.*,

Defendants.

No. 2:21-cv-00100-RAJ-JRC

DECLARATION OF SALLY RUSK

Noted on Motion Calendar:  
April 2, 2021

I declare under penalty of perjury that I am over the age of 18 and competent to testify, and that the following is true and based on my personal knowledge:

1. I am the daughter of Detective Sergeant Clement Rusk, one of the King County Sheriff's Deputies named in Mr. Simmers' lawsuit.

2. My father died on February 5, 2007. To the best of my knowledge, my mother, Julia Lee Rusk, was the sole heir of my father's estate. My mother then died in 2014.

Signed Mar 27, 2021, at Seattle, Washington.

Sally Rusk

Sally Rusk (Mar 27, 2021 17:14 PDT)

Sally Rusk

**CERTIFICATE OF SERVICE**

I certify that on the date below I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

**Attorneys for Plaintiff**

David B. Owens

John Hazinski

**Attorney for King County**

Samantha D. Kanner

**Attorneys for Bothell Defendants**

Shannon M. Ragonesi

Paul J. Triesch

I further certify that on the date below I mailed by U.S. Postal Service a copy of the foregoing document to the following non-CM/ECF participants:

N/A

DATED: March 29, 2021

s/Geoff Grindeland

Geoff Grindeland